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CLERK OF DISTRICT COURT  
GREAT FALLS, MONTANA

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DEPUTY

MONTANA EIGHTH JUDICIAL DISTRICT COURT  
CASCADE COUNTY

JEANNIE KELLER,

Plaintiff,

v.

EXAMONE WORLD WIDE, INC.,  
JOHN DOES 1-5, and PRACTICE  
ENTITIES XYZ,

Defendants.

Cause No.: **BDV-15- 658**

**JULIE MACEK**

COMPLAINT AND  
DEMAND FOR JURY TRIAL

Plaintiff alleges the following facts and asserts the following claims against Defendants:


1. At the time of the events that gave rise to this case Ms. Jeannie Keller lived in Great Falls, Montana.
2. ExamOne is a business registered with the State of Montana, hired by insurance companies to provide services to potential clients who are residents of Montana. ExamOne, through its agents and employees, operates in Cascade County.

3. In May, 2013, Jeannie applied for life insurance through MetLife Insurance Companies. As part of the application process, MetLife required blood be drawn.
4. On May 21, 2013, Nurse Linda Lindeman from ExamOne met Jeannie to complete the physical exam required by MetLife.
5. Nurse Lindeman attempted to draw Jeannie's blood, but had difficulty locating the vein. Jeannie has small veins and told Nurse Lindeman a butterfly needle would likely be necessary.
6. Nurse Lindeman chose not to use a butterfly needle. Instead, she used a larger needle, which she pushed into the inside of Jeannie's left arm. The attempt was unsuccessful. In her attempt to locate the vein with the large needle, Nurse Lindeman injured Jeannie's left arm, including injury to the ulnar nerve. Jeannie felt pain shoot down her arm.
7. Nurse Lindeman moved to Jeannie's right arm, agreed to locate and use a butterfly needle, and successfully drew blood.
8. The pain in Jeannie's left arm grew worse. Within approximately 48 hours of the needle puncture, Jeannie started to lose functionality. She could not make a fist; her arm was swollen, tight and tingling.
9. She is left handed and, because of this injury, has trouble writing, typing, carrying groceries, completing housework, and driving long distances. She could not continue her job as a legal secretary and has not been able to return to work because of this injury.
10. Jeannie has been diagnosed with Complex Regional Pain Syndrome (CRPS).

11. Medical treatment required for treatment and diagnosis since the needle puncture includes examination at Urgent Care, physical therapy, pain medication, EMG testing, and treatment from specialists in physical therapy, neurology, orthopedic surgery, anesthesiology/pain management, and neurosurgery.
12. A spinal cord stimulator was placed in 2014 to try to stop the spread of the CRPS; it did not work. Jeannie continues to need medical treatment. Future medical expenses are expected.
13. The injury to Jeannie's ulnar nerve has caused the following damages:
  - a. Past and future medical expenses to diagnose and treat the injury and chronic condition caused by Nurse Lindeman;
  - b. Loss of past and future earnings and earning capacity;
  - c. Pain, stress, and worry;
  - d. Damage to Jeannie's established course of life.
14. Jeannie Keller claims the following relief:
  - a. Compensation for the damages listed above;
  - b. Her costs of this law suit;
  - c. All other fair and lawful relief.

Dated August 14, 2015.

By:




Stephanie C. Kucera  
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DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury of all issues of fact in this case.

Dated August 14, 2015.

By: \_\_\_\_\_



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